

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC,

Respondent.

DOCKET UT-181051

**DIRECT TESTIMONY OF ANGELA WHITE
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT AW-1T

December 15, 2021

1 **Q. Please state your name, age, city of residence, and occupation.**

2 A. My name is Angela White. I am over 18 years old, and I live in Olympia,
3 Washington. I am currently employed by the Washington State Department of
4 Social and Health Services as a nurse aide and caregiver.

5 **Q. On whose behalf are you testifying?**

6 A. I am testifying on behalf of the Public Counsel Unit of the Attorney General's
7 Office. I was asked to testify about my experience during the more than two-day
8 outage of 911 service that occurred in December 2018.

9 **Q. What happened on December 27, 2018?**

10 A. On December 27, 2018, I was at home with my daughter Marissa White and
11 husband David White. About 6:45 am, I looked over and saw David try to stand
12 and he fell right over. He felt hot and sweaty to the touch. I called 911 on my cell
13 phone since that is the phone that works with my hearing aids. There was no
14 answer. I tried five times more, then got a "beep, beep, beep" tone. In 1997, I
15 worked as a 911 dispatcher in Anchorage, Alaska, and I knew from that
16 experience that the "beep, beep, beep" tone meant a problem with the line. I
17 decided I would have to get David to the hospital myself.

18 **Q. Was it a challenge to get David to the hospital quickly?**

19 A. Yes. David weighed 320 pounds at the time. I had to get clothes on him, put him
20 on my back to drag him down our front steps, and together with our then 15-year-
21 old daughter Marissa, I walked him 50 feet to our F-150 pickup truck. He was just
22 responsive enough to be able to help pull himself up and into the passenger seat. I
23 drove along Kinwood to Martin Way, then to the St. Peters ER, talking to him the
24 whole time to assess his alertness, which seemed to come and go. I can't

1 remember exactly how long the drive took, but it usually takes about 20 minutes
2 to get from our house to the hospital. When I arrived at the ER, nobody was
3 around for me to flag down. I left David alone and went to the front desk to alert
4 staff. When I came back out to our truck, I saw that a doctor coming back from
5 break had spotted David alone in the passenger seat and had started attending to
6 him.

7 **Q. What did you learn about David's condition?**

8 A. David had suffered a blood pressure spike. Altogether, about six doctors worked
9 to get his blood pressure down from where it had risen by the time he arrived. By
10 then, it had reached about 300/180, which meant he was in shock mode. The
11 doctors said they had never seen somebody with blood pressure that high be able
12 to be nearly as responsive as David was. David was unable to use his right hand
13 properly. The doctors tested for stroke but found no evidence of one. David
14 reported seeing black spots with no vision. As a measure of how serious the
15 situation was, the hospital brought a chaplain to wait with me while the doctors
16 were working to lower David's pressure.

17 **Q. Were ER staff aware of the 911 outage in the area?**

18 A. No, the ER had no clue that 911 was out. They told me they were wondering why
19 they did not have any patients. Eventually, the blog Thurston County Scanner,
20 News, and Weather was the first to put out the alert.

21 **Q. Can you describe David's treatment progression in the hospital?**

22 A. After two days of David being treated in a bed in the hallway, he was moved into
23 a room since his blood pressure still had not dropped safely. Since he remained
24 unable to use his right hand, I helped feed David during the week and a half he

1 was in the hospital. While there, David started getting migraines, and he still
2 suffers from them. David was also diagnosed with glaucoma, and his kidney
3 function became a concern.

4 **Q. Did David's condition remain stable after he was discharged?**

5 A. No. A couple of weeks later, David had a similar event to the one that happened
6 during the outage. I called 911 and about four medics arrived. While I was
7 attempting to explain David's history, they were looking all around our house as
8 if they were appraising what kind of people David and I were. Rather than load
9 David onto a gurney, the medics forced David, then barely conscious, to stand up
10 and walk the 50 feet from the house to the ambulance. I later learned the medics
11 at some point apparently drug tested David with no notice. As my daughter
12 Marissa and I were leaving the house to follow the ambulance, she found the drug
13 test wrapper in my and David's bedroom. We live in a nice home with a nice
14 neighborhood, so I feel that there was no reason for any suspicion. Additionally,
15 911 had not been called to our address since we moved there in 2018.

16 **Q. What happened next?**

17 A. The EMTs left for the hospital without activating their unit's emergency lights or
18 siren. They either drove extra slowly or took the long way around to the hospital,
19 since Angela and I arrived there before the EMTs did. The ER doctor grew angry
20 when he learned the EMTs had not radioed to alert hospital staff to be ready to
21 treat David on arrival. The ER treated David to lower his blood pressure. While
22 he was in the hospital this second time, David's migraines continued, and he
23 could not eat a thing.

1 **Q. Have these medical conditions cleared up since David's last hospitalization?**

2 A. No. I asked the doctors to prescribe the migraine medication Imitrex. They did,
3 but he got only brief relief from that. He saw neurologists who prescribed shots
4 that helped David, but now our insurance will not cover them, and we cannot
5 afford their out of pocket cost. David now gets migraines twice a week with no
6 relief of any kind available. David continues to have the kidney problems that
7 arose during the outage, vision problems including glaucoma, and vertigo on top
8 of the migraines.

9 **Q. Describe how you feel the outage affected your experience of these events.**

10 A. I believe, but will never know for sure, that prompt EMT treatment and transport
11 during the outage might have kept David's blood pressure from spiking as high as
12 it did by the time our daughter and I could finally get him to the hospital
13 ourselves. I also believe, but will never know for sure, that the subsequent
14 migraine, glaucoma, serious kidney trouble, and vertigo might have been lessened
15 or avoided altogether. I believe, but will never know for sure, that David's
16 subsequent, humiliating EMT treatment that our daughter and I had to witness
17 during his second trip to the hospital would never have been necessary.

18 **Q. Does this conclude your testimony?**

19 A. Yes.

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DOCKET UT-181051

**DIRECT TESTIMONY OF DAVID WHITE
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT DW-1T

December 15, 2021

1 **Q. Please state your name, age, city of residence, and occupation.**

2 A. My name is David White. I am over 18 years old, and I live in Olympia,
3 Washington. I am currently on disability.

4 **Q. On whose behalf are you testifying?**

5 A. I am testifying on behalf of the Public Counsel Unit of the Attorney General's
6 Office. I was asked to testify about my experience during the more than two-day
7 outage of 911 service that occurred in December 2018.

8 **Q. What happened on December 27, 2018?**

9 A. On December 27, 2018, I was at home with my daughter Marissa White and wife
10 Angela White. I woke up that morning feeling great. I went to the bathroom and
11 started not feeling well. I came out of the bathroom, and told my wife I was not
12 feeling too good. I remember sitting on the edge of our bed and things got foggy.

13 **Q. What is the next thing you remember?**

14 A. The next thing I remember is bits and pieces of conversation with my wife as she
15 drove me to the hospital in our pickup truck. After that, there is a gap in my
16 memory, until I woke up in a bed in a hallway at St. Peter Hospital in Olympia. I
17 lay for two days on that bed in their hallway while we waited for a room to open
18 up.

19 **Q. What did you learn about what happened to you?**

20 A. My blood pressure had spiked very high by the time I was seen for treatment and
21 had been very slow to respond to treatment to bring it back down.

22 **Q. What happened after you moved into a hospital room?**

23 A. After moving from the hallway to a hospital room, staff opened the window
24 blinds in the morning. I immediately felt what turned out to be a migraine

1 headache, the first of my life. The exam for that also diagnosed me for the first
2 time with glaucoma, which the medical staff told me was also related to the blood
3 pressure spiking so long. In addition, my kidneys were functioning poorly after
4 the spiking occurred.

5 **Q. How long were you in the hospital?**

6 A. I was in the hospital for a week and a half. A couple of weeks after discharge, my
7 kidneys suddenly felt like they shut down. We called 911. The EMTs would not
8 examine my hospital release records to verify my history and treated me like I
9 must be a drug seeker. Though my family's home is wheelchair accessible they
10 refused to carry me on a gurney from the house to the ambulance. They forced me
11 to walk instead as they observed me closely. I had to drag myself all the way
12 through the house, out the door, and down our driveway to the ambulance. My
13 wife and daughter had to watch me go through this.

14 **Q. What happened next?**

15 A. Once I was in the ambulance, the EMTs worked on me as they transported me to
16 St. Peter Hospital. The EMTs put me in a hospital room, but they did not tell
17 medical staff I was there awaiting treatment. After some time, the staff learned
18 where and who I was and worked to stabilize my kidneys. My wife told me she
19 had found discarded paper wrappings for a drug test left behind in our bedroom,
20 which led us to think that the EMTs had drug tested me without telling me.
21 Doctors told me they suspected the kidney damage and other damage throughout
22 my body could be from the blood pressure pills I had been on, and also the blood
23 pressure spike I experienced during the outage.

1 **Q. What has your medical condition been like since these events?**

2 A. I am on seven medications now, taking up to 13 pills daily. COVID put a hold on
3 follow up appointments: I got COVID-19 in November 2020, so I stayed home.
4 My wife got it first, then me, then our daughter. Our daughter was not as sick, but
5 my wife and I got hot and cold sweats, and experienced a persistent loss of taste
6 and smell. I still have no taste of any kind of food. My sense of smell is
7 occasional and not pleasant. For example, if I smell mold, that will trigger one of
8 the massive migraines that I had never experienced before these events.

9 **Q. Describe how you feel the outage affected your experience of these events.**

10 A. It was horrible to realize my family had to carry me to the truck and get me to the
11 hospital themselves, especially when I could have received treatment from EMTs
12 right away. My understanding is that by the time my wife and daughter were able
13 to get me to the hospital themselves my blood pressure had spiked so high that
14 getting it back down was a long process. And, the length of that process caused
15 me many new injuries, including Stage 3 kidney disease, glaucoma, migraines,
16 and vertigo. My family and I have to live with this new reality every day.

17 **Q. Does this conclude your testimony?**

18 A. Yes.

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**DIRECT TESTIMONY OF SAMANTHA HOVEY
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT SH-1T

December 15, 2021

1 **Q. Please state your name, age, city of residence, and occupation.**

2 A. My name is Samantha Hovey. I am over 18 years old, and I live in rural Skagit
3 Valley, Washington. I am currently employed by Fox Transportation as a driver.

4 **Q. On whose behalf are you testifying?**

5 A. I am testifying on behalf of the Public Counsel Unit of the Attorney General's
6 Office. I was asked to testify about my experience during the more than two-day
7 outage of 911 service that occurred in December 2018.

8 **Q. What happened on December 27, 2018?**

9 A. Around 9 or 10 pm on December 27, 2018, my husband and I returned home after
10 an evening at my parents' house. Our house is on a five-acre rural property that
11 once was my grandfather's farm. The house is at the end of a 900-foot driveway,
12 and as is our custom, my husband and I drove directly into our garage and entered
13 the house from the connecting door. Ours is a three-story house on a slope. From
14 the garage entry, we went downstairs to our bedroom, on the ground floor in back,
15 where a sliding glass door leads to a backyard with a woodpile.

16 **Q. What happened next?**

17 A. My husband changed his clothes and exited the sliding glass door to chop wood
18 for our bedroom stove. I heard him shout that he heard something, and then I also
19 heard the sounds of something moving around from the back to the side of the
20 house through the shrubbery. My husband called out to bring him a gun, but I
21 called 911 first. I got a busy signal from 911, so I called again, dialing a total of
22 four or five times. During that time my husband grabbed a long gun from the
23 house and went out to see if he could find the prowler.

1 **Q. Were you aware that there was a widespread 911 outage?**

2 A. No, I was not. I do not recall receiving any notice of a 911 outage until the next
3 day.

4 **Q. Were you able to reach help without 911?**

5 A. Yes. Using my cell phone I called my mother, who lives in neighboring
6 Snohomish County, on her cell phone, to see if she could call 911 for us. After a
7 few moments my mother called back to say she reached Snohomish 911 who said
8 they were sending Skagit officers after both. She said the 911 operator
9 complained that she should not be calling them for Skagit County assistance, and
10 attempted to hang up before getting the details, requiring my mother to shout at
11 them not to disconnect. The first officer arrived between 10 and 15 minutes later,
12 joined soon by two more in additional cars. My husband returned from his search
13 around the property and reported the person appeared to have gone through the
14 fence to the neighboring cow pasture. The officers didn't seem very interested in
15 what had happened, scolded us for having used Snohomish to dispatch them
16 instead of their own department's non-emergency line, and even made fun of my
17 husband for having gone after the prowler himself. The officers stood around
18 pointing their flashlights this way and that from where they stood, said they would
19 put out an alert to be on the lookout, and drove away. My husband and I looked
20 around the property ourselves since the police had not. We noticed several
21 Hondas we kept parked alongside the house appeared to have been rummaged
22 through, but found no damage or evidence of theft.

1 **Q. Describe how you feel the outage affected your experience of these events.**

2 A. I feel so lucky I had my mom in a neighboring county at a location where it
3 turned out no 911 outage was going on. I was surprised no one knew there was a
4 broad outage. I am very glad I did not need police help more urgently thanks to
5 that particular prowler fleeing rather than trying to rob us.

6 **Q. Does this conclude your testimony?**

7 A. Yes.

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DOCKET NO. UT-181051

**DIRECT TESTIMONY OF VICTOR BARAJAS
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT VB-1T

December 15, 2021

1 **Q. Please state your name, age, city of residence, and occupation.**

2 A. My name is Victor Barajas. I am over 18 years old, and I live in Pasco,
3 Washington. I am currently employed by Wal-Mart Distribution.

4 **Q. On whose behalf are you testifying?**

5 A. I am testifying on behalf of the Public Counsel Unit of the Attorney General's
6 Office. I was asked to testify about my experience during the more than two-day
7 outage of 911 service that occurred in December 2018.

8 **Q. What happened on December 28, 2018?**

9 A. Around 1:40 am on December 28, 2018, I was driving to work on I-182
10 westbound near Mile Marker 2 when I caught ice, hit the median, and rolled my
11 vehicle three times.

12 **Q. What is the next thing you remember?**

13 A. The roof of my car was completely smashed, and my car had no power. I later
14 found the battery had come loose. The highway was empty of other travelers due
15 to the hour. I wondered if I might be in shock and did not want to risk movement.
16 I remembered my phone had been in my pocket and found it was still there. I
17 dialed 911, but got no ring or busy signal. I tried two or three times with the same
18 result. I tried calling a few people in my contacts directory, but none answered
19 due to the hour. I left a voicemail for my father in case he might check. I then
20 realized my boss would be at work, so I called and got through to her. I let her
21 know I couldn't get through to 911, and she said she would call the non-
22 emergency line for me.

1 **Q. What happened next?**

2 A. After my boss and I hung up, my dad called and said he would come. My father
3 arrived at the same time as the trooper responding to my boss's call. By now,
4 about 30 minutes had gone by since my first attempt to call 911. By this time, I
5 had regained confidence that I was not seriously injured, so my dad helped me out
6 of the car and drove me to the emergency room to get checked over, where they
7 found only minor bruises.

8 **Q. How did you learn there was a system wide 911 outage?**

9 A. Neither the trooper nor anyone at the hospital ever mentioned there was a 911
10 outage. I never received an alert or message about an outage before or after my
11 crash. I read about the outage days later, and had no idea the outage had lasted so
12 long.

13 **Q. Describe how you feel the outage affected your experience of these events.**

14 A. I feel very lucky I was uninjured, my phone was undamaged, and the car did not
15 catch fire with me trapped inside. Given the time of morning, with my contacts
16 unlikely to answer their phones and worried I might be in shock, I felt a strong
17 concern when I could not reach 911. I am very glad my boss was at her office
18 already and able to use an alternate system to reach help. I am very disappointed
19 to learn first-hand that no duplicate system existed that would take over if the
20 regular 911 system failed.

21 **Q. Does this conclude your testimony?**

22 A. Yes.